

The Honorable Karen L. Strombom

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

KEN ARONSON,)	No. 3:10-CV-05293-KLS
)	
Plaintiff,)	DECLARATION OF BRUCE E. H.
)	JOHNSON IN SUPPORT OF
v.)	REPLY IN SUPPORT OF
)	DEFENDANT'S MOTION FOR
DOG EAT DOG FILMS, INC.,)	ATTORNEYS' FEES AND COSTS
)	UNDER RCW 4.24.525
Defendant.)	
)	NOTE ON MOTION
)	CALENDAR: OCTOBER 8, 2010
)	

I, Bruce E. H. Johnson, am over the age of 18 and have personal knowledge of all facts stated herein and declare as follows:

1. I am a member of the Bar of the State of Washington and of the Bar of this Court. I am also a partner in the law firm of Davis Wright Tremaine LLP ("DWT"), and one of the lawyers responsible for representing Dog Eat Dog Films, Inc. ("Defendant") in this matter. I make this declaration in support of Defendant's Reply in Support of Defendant's Motion for Attorneys' Fees and Costs Under RCW 4.24.525. The matters stated here are true of my own personal knowledge, except for matters stated on

1 information and belief, which I believe to be true.

2 2. I was married in Seattle on May 22, 2010, and left the country with my
3 bride on May 23, 2010 for a honeymoon in New Zealand. My wife and I then went to
4 New York beginning on June 2 (because she had to return to her job there).

5 3. I did not return to the office until June 7, 2010. While my wife worked in
6 New York, I had some time to catch up on various client matters.

7 4. Much to my annoyance, I was occasionally asked to respond to various
8 client issues that arose while on our honeymoon.

9 5. I did not intend to work while half-way around the world on my
10 honeymoon. Even if I had wished to work, the 19-hour time difference between Seattle
11 and New Zealand and the lack of regular access to office facilities were not conducive to
12 regular legal work and would have made it impracticable to efficiently and effectively
13 collaborate with my client and co-counsel. I planned to do little or no work during that
14 time and, to the best of my ability, did only a minimal amount of legal work while on my
15 honeymoon.

16 6. When I stated to opposing counsel that I was intending to be on my
17 honeymoon and unavailable to office needs, I was completely honest. I was also quite
18 hopeful that I would not be interrupted during my travels with my bride.

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1 I declare under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct.

3 DATED this 8th day of October, 2010 in Seattle, Washington.

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5 By /s/ Bruce E. H. Johnson
6 Bruce E.H. Johnson
7 WSBA #7667
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